<center>**REMARKS**</center>

This paper is responsive to the Office Action mailed December 4, 2006.

In the Office Action, claims 1-38 were rejected under 35 U.S.C. §103(a) as being unpatentable over Hawkins et al. (U.S. Patent No. 6,343,318 B1) in view of Ndili (U.S. Patent No. 6,950,881). Reconsideration and withdrawal of these rejections are respectfully requested.

I.   Independent claim 1

Independent claim 1 recites:

> **responsive to the first request for content, sending to the mobile device an address of the requested content in a reference format;**
> **receiving a second request from the mobile device for the content subsequent to the first request for content, the second request received from the mobile device being different from the first request received from the mobile device, the second request specifying an address of the requested content and a type of the mobile device;**

The primary reference to Hawkins et al. does not teach receiving a second request from the mobile device for the requested content, as acknowledged in the outstanding and previous Office Actions. It falls, therefore, to the secondary reference to Ndili to teach or to suggest the claimed subject matter. Failing such, the 35 U.S.C. §103(a) rejection must be reconsidered and withdrawn.

Although page 4 of the outstanding Office Action references "Minborg" on several occasions, the undersigned assumes herein that the Office meant "Ndili" instead, as Minborg is not applied in this Office Action.

Ndili does not teach or suggest, whether considered alone or in combination with Hawkins et al., receiving the first <u>and</u> second requests as claimed. That Hawkins et al. fails to do so has already been established (and repeatedly acknowledged by the Office). The Examiner is respectfully reminded that the definite article "the", in the recitation "the second request specifying

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an address of **the** requested content" refers to the same "requested content" as the first request from content received from the mobile device.

Keeping the foregoing in mind, it is respectfully submitted that Ndili does not teach a second request from the mobile device (MD) for the content requested in the first request for content from the mobile device. In other words, neither Hawkins et al. nor Ndili, whether considered singly or in combination), teach or suggest receiving both a first request for content and a second request for **the** content from the mobile device, and much less receiving the second request for the content such that the second request specifies "an address of the requested content and a type of the mobile device", as claimed.

Indeed, Hawkins teaches one way for a mobile device to receive content (using a single HTTP request – see Hawkins et al.'s Fig. 1) and Ndili teaches another way for a mobile to receive content (again, using a single request). However, both patents teach that mobile devices issue a **single request** that is serviced to return the requested content to the mobile device. That two patents use two different methods for a mobile device to retrieve data using two respectively different methods does not, in itself, teach or suggest a mobile device that issues two separate requests to obtain content. There is no teaching or suggestion in Ndili that would motivate a person of ordinary skill to modify Hawkins et al. to achieve the claimed subject matter in which a second request is received for the content requested by the first request for content. Quite to the contrary, the person of ordinary skill in the art would not be motivated to use two requests to obtain requested content, as both Hawkins et al. and Ndili teach that a single request from a mobile device is sufficient to obtain the requested content.

Ndili teaches that the mobile device issues a single request to receive content from the network site (e.g., web site). See, for example, Fig. 1 of Ndili:

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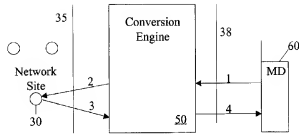
As can be seen, a single request (1) from the mobile device (MD) 60 results in the conversion engine 50 accessing the network site 30, receiving the requested content therefrom, and the requested and converted content being sent back to the MD 60.

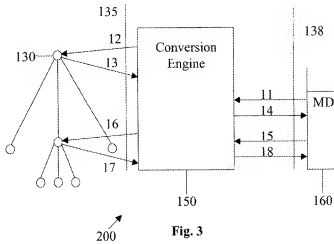Fig. 3 shows the same <u>single request for content</u>:

Fig. 3

The single request for content 11 results in the conversion engine obtaining content from the site 130 and returning the requested content at 14. Request 15 is NOT a second request for the same content requested at 11. Request 15 is a request for content from a link contained in the content returned at 14, as stated in Ndili at Col. 6, lines 28-31:

> **A request 15 represents a selection made by the user of mobile device 160 to receive content from network site 133, located by the corresponding internal link displayed on mobile device 160 with content 14**

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The same holds true for Fig. 5 and single requests 111, 115 and 119. In each case, a single request for content 111, 115 and 119 from the MD 460 results in the requested content being returned by the conversion engine at 114, 118 and 122, respectively.

The Office points to Fig. 6 and the teaching of Ndili that the request from the mobile device 560 may include the selected network site and the type of mobile device, and that such provided information may be used by the conversion engine to look up the language of the mobile device to enable the conversion engine to provide the requested content to the mobile device in the appropriate language. Fig. 6 is reproduced hereunder:
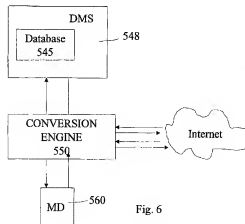

Fig. 6

As can be seen, a single request from the MD 560 results in the requested content being provided. Ndili does not teach or suggest any second request for the content (the content requested by the first request). Ndili, responsive to the conversion engine receiving the request from the MD 560, the database 545 is consulted, and the information retrieved therefrom is used by the conversion engine to format the content requested by the MD 560. See, e.g., Col. 9, lines 42-57.

There is no teaching or suggestion in Ndili or the Hawkins et al. – Ndili combination that would lead a person or ordinary skill in the art to devise a method that includes steps of:

> responsive to the first request for content, sending to the mobile device an address of the requested content in a reference format;
>
> receiving a second request from the mobile device for the content subsequent to the first request for content, the second request received from the mobile device being different from the first request received from the mobile device, the second request specifying an address of the requested content and a type of the mobile device;

as claimed in independent claim 1. Indeed, Hawkins et al. do not teach the claimed steps of receiving the first and second requests from the mobile device. The Hawkins et al. method, as discussed in Columns 13 and 14 as well as Fig. 2, calls for three phases: a distributed web site process; a query process; and a response process. The distributed web site process calls for an application to be created to handle requests from mobile devices. Hawkins et al. teach that an application is created for each web site. This allows some static content to be pre-stored on the mobile device and the dynamic portion of the web site to be downloaded to the mobile device upon request. The query process is the second of the three phases. In this phase, the user fills out a query form and submits the form, which initiates the wireless CTP query to the proxy server 180. The proxy server 180 converts the CTP query to HTTP format and forwards the converted query to the web server 140, which completes the query phase. **Note the absence of any step in which a second request for the content requested by the first request is received from the mobile device.** The response phase (described beginning at Col. 14, line 59) includes the proxy server converting the web server's response into a query response 107, which is then transmitted over the private wireless network 172 to the mobile device, which then incorporates the received response data (the dynamic portion of the requested web site) into the static portion of the web site pre-loaded into the mobile device (see Col. 13, lines 1-9).

The secondary reference to Ndili teaches a conversion engine interposed between the network site and the mobile device to transliterate the mobile device requests in one language

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(e.g., HDML spoken by the mobile device) into requests in another language (e.g., CHTML) and vice versa. Ndili teaches a response for every request by the mobile device, as demonstrated above. **Note again the absence of any step in which a second request for the content requested by the first request is received from the mobile device**. There is no teaching or suggestion in either of the applied references (whether considered alone or in combination) of requiring two requests (a first request and a second request) from the mobile device to retrieve the requested content, as required by the pending claims. Failing such, it is respectfully submitted that the obviousness rejection of claim 1 and of its dependent claims must be reconsidered and withdrawn. The same is, therefore, respectfully requested.

II.   Independent claim 20

On page 11, the Office again refers to the Hawkins et al.-Minborg combination, although Minbord was not applied in this Office Action. For purposes of this response, it is assumed that the Office meant "Ndili", instead of Minbord.

Independent claim 20 recites:

> a first proxy server configured to receive a second request from the mobile device for the content, the second request received from the mobile device being different from the first request received from the mobile device, the second request including the address of the requested content in the reference format and a type of the mobile device, to fetch the content at the received address responsive only the second request only, to convert the fetched content from the reference format to a format suitable to the type of mobile device and to deliver the converted content to the mobile device.

Kindly note that claim 20 includes the recitation "a second request from the mobile device for the content" and "the second request including the address of the requested content", as does independent claim 1. Therefore, the arguments advanced relative to claim 1 are equally applicable to independent claim 20. As such the above arguments are incorporated herein by reference as if repeated here in full. Independent claim 20, therefore, is believed to be allowable for the same

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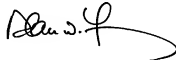Atty. Docket No. ORCL5769

reasons as is independent claim 1.

Moreover, claim 20 requires a first server configured as claimed and a first proxy server, which is a separately claimed element from the first server. However, the Office has identified the first server and the separately claimed first proxy server as both corresponding to Hawkins item 180. Assuming, *arguendo*, that the claimed first server and the separately claimed first proxy server both correspond to Hawkins et al.'s item 180 (which they do not), the requirements of the claim are <u>still</u> not satisfied. Missing from the applied combination is the "second request received from the mobile device being different from the first request received from the mobile device, the second request including the address of the requested content in the reference format and a type of the mobile device." Missing also is a first server (204 in Applicant's Fig. 3) configured to receive the first request (S1 in Applicant's Fig. 3) from the mobile device <u>and</u> a second server (the claimed first proxy server – see 208 in Applicant's Fig. 3) that is configured to receive a second request (S3 in Applicant's Fig. 3). Each of the two references disclose a single server (the proxy server 180 in Hawkins et al. and the conversion engine 50 in Ndili) that receives a single request (HTTP request in Hawkins et al.) from the mobile device to receive the requested content (HTTP response in Hawkins et al.). It is only independent claim 20 (and not the applied combination) that recites a first server <u>and</u> a first proxy server, each being configured to receive a separate request from the mobile device for the same content, as claimed.

Regarding both the rejections of independent claims 1 and 20, it is respectfully submitted that the combination of Hawkins et al. and Ndili would not teach the claimed embodiments. Rather, a person of ordinary skill in this art in full possession of both references would only be motivated to modify Hawkins et al. by providing Hawkins et al. with the functionality of the mobile device providing Hawkins et al.'s proxy server 180 with the address of the network site

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being requested and the identity of the mobile device, as taught in Ndili at Col. 9, lines 37-41. Missing and wholly unsuggested from such a combination would be the methods and computer systems claimed herein, particularly the second request for _the_ content requested by the first request for content as claimed in both claims 1 and 20 and the first server and the first proxy server, each configured as claimed in claim 20. Reconsideration and withdrawal of the obviousness rejections of claims 1 and 20 and of their respective dependent claims are, therefore, respectfully requested.

It is believed that the arguments presented in this Response overcome the outstanding rejections and places this application in condition for allowance. Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Should the Examiner have any further questions regarding this Response or the application in general, he need only call the undersigned, and whatever is needed will be done immediately.

Respectfully submitted,

Date: March 5, 2007   By:_____

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